full, complete, and true record of said testimony.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing deposition and caption named, or in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this day of , 1997.

SANDRA L. CARRANZA
Certified Shorthand Reporter
Registered Professional Reporter

0076

CHAMBERLIN & ASSOCIATES
Certified Shorthand Reporters
Two Embarcadero Center, Suite 1710
San Francisco, California 94111

3/20/97

TO: CARYN D. MOIR
PILLSBURY, MADISON & SUTRO
c/o ED KOLTO-WININGER, ATTORNEY AT LAW
235 Montgomery Street
San Francisco, California 94104

RE: MCI TELECOMMUNICATIONS CORPORATION vs. PACIFIC BELL AND PACIFIC BELL COMMUNICATIONS
Date of Deposition: March 13, 1997
Reported By: SANDRA L. CARRANZA, CSR 7062

CARYN D. MOIR:

The original transcript of your deposition taken in the above-entitled action has been prepared and is available at this office for your reading, correcting, and signing.

You may wish to discuss this matter with your attorney to determine if counsel requires that the original transcript of your deposition be read, corrected, and signed by you before it is sealed.

Your rights regarding signature of this deposition are contained in the California Code of Civil Procedure.

Unless otherwise directed, your original deposition transcript will be sealed after 35 days from today's date.

If you wish to make arrangements to review the original transcript of your deposition, please contact this office during office hours, 9:00 to 5:00 Monday through Friday, to make an appointment to review the original transcript.

Sincerely,

SANDRA L. CARRANZA
Certified Shorthand Reporter
Registered Professional Reporter

cc: All Counsel

Attachment A to MCI Comments 3-10-97

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION
Harrisburg, Pa.

In the Matter of	)	
Implementation of the	)	DOCKET No. M-960840
Telecommunications Act of 1996	)	
Bell Atlantic-Pennsylvania's	)	
Entry Into In-Region InterLATA	)	
Services Under Section 271	)	

DECLARATION OF ROBERTO MORSON
On Behalf of MCI Telecommunications Corporation

I, Roberto Morson, declare as follows:

1. I am the Director of National Carrier Requirements within MCI's Financial Operations Group. I am responsible for establishing MCI's requirements for the resolution of outstanding issues with local exchange carriers for both access and local service. This includes coordinating MCI's representation at industry standards setting bodies such as the Ordering and Billing Forum ("OBF") of the Carrier Liaison Committee and the Electronic Communications Implementation Committee ("ECIC"). I also serve as lead negotiator for MCI in the § 252 negotiations with Bell Atlantic and Sprint.

2. I received a bachelors degree in Civil Engineering from Cornell University in

1980. I also received an MBA in Financial and Operations Management from the Johnson School of Management, also at Cornell, in 1985. I have worked for MCI since 1983. My positions have included serving as the Senior Manager of Network Initiatives in MCImetro's Local Service Network Engineering group, responsible for developing an implementation plan for unbundled loops, interim number portability and resale. This included representing MCI at the OBF for the development of the local service request for network elements and resale. I have also held positions in Business Development for Local Initiatives and in Carrier Relations with Competitive Access Providers.

3. The purpose of my affidavit is to respond to Bell Atlantic's contentions that its Operations and Support Systems ("OSS") are adequate to fulfill its obligations under section 271 of the Telecommunications Act. I conclude that neither the systems that Bell Atlantic has already implemented, nor those which it has promised to implement, are adequate to fulfill its obligations under the Act.

4. My affidavit is in five parts. Part I provides a general background on OSS functions and the role they will play in ensuring the development of local competition. Part II explains why Bell Atlantic's OSS functions are not ready to provide Competitive Local Exchange Carriers ("CLECs") the ability to resell Bell Atlantic services and to access unbundled network elements in a timely, reliable, and nondiscriminatory manner. Part III briefly discusses the independent problem of Bell Atlantic's refusal to adopt adequate performance standards and reporting requirements. Part IV summarizes the insufficiency of Bell Atlantic's proposal on directory

assistance. Finally, Part V discusses Bell's position on resale.

5. In order better to enable the Commission to understand the inadequacy of Bell Atlantic's OSS functions and interfaces, I will specifically respond, where appropriate, to the Declaration of Donald Albert submitted with Bell Atlantic's Supplemental Report.

I. The Role and Importance of OSS

6. OSS consists of those systems that ensure that a carrier can satisfy customer needs and expectations. Bell Atlantic has for years used highly complex OSS systems to manage interactions with its own customers. Its well-tested systems ensure, for example, that customer service representatives have immediate real-time access to all information necessary to respond fully and correctly to customer queries about such things as the variety and prices of services available, or the status of repair calls.

7. There are five discrete business functions OSS serves: pre-ordering, ordering, provisioning, maintenance and repair, and billing.[1] A customer service representative uses pre-ordering functions to, for example, determine which features are available to the customer, what new phone numbers to assign the customer, and on what day a customer's new line can be installed. The customer service representative then uses

[1] See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, First Report and Order, at ¶¶ 515, 518, CC Docket No. 96-98, FCC 96-325 (rel. Aug. 8, 1996) (hereinafter "Local Competition Order").

the ordering system to send the order to the location at which it is processed; a reply message uses the "provisioning" system to confirm that the order is in the correct format and has been accepted. Maintenance and repair systems transmit trouble tickets from the customer service representative to the technicians who perform the maintenance. Billing systems ensure that bills are complete, timely, and accurate.

8. While Bell Atlantic's existing systems enable it to smoothly perform these functions for its own retail customers, the Telecommunications Act of 1996 requires changes to enable competition to develop in the local markets. To the extent new competitors such as MCI must rely on the ILEC's network and OSS capabilities for a realistic opportunity to compete, it will be essential for the incumbent local exchange carrier (ILEC) to develop and implement OSS interfaces and downstream processes sufficient to ensure that it can provide unbundled network elements and resale in timely, reliable, and nondiscriminatory fashion in volumes adequate to satisfy demand. Thus, the FCC explained in its Local Competition Order that "providing nondiscriminatory access to these support system functions . . . is vital to creating opportunities for meaningful competition." Local Competition Order, ¶ 518. As a result, the FCC specifically required that, by January 1, 1997, ILECs develop interfaces capable of providing CLECs nondiscriminatory unbundled access to the ILEC's OSS functions. Local Competition Order, ¶¶ 523, 525.[2] Nondiscriminatory access to OSS requires both that the interfaces employed by Bell Atlantic are sufficient

[2]As shown below, Bell Atlantic obviously did not meet the January 1 deadline.

to satisfy competitive needs and that experience with those interfaces is sufficient to ensure that they do indeed work in reality.

Interfaces and Specifications

9. There are many different OSS interfaces by which a CLEC could access BOC OSS functions. One basic division is between automated and manual access. Manual access requires human intervention on the part of the BOC. For example, one manual method of transmitting orders is to send the information by fax, at which point a BOC employee types the information supplied on the fax into the BOC's computerized order entry system. Manual intervention also occurs when, after information is exchanged electronically, a BOC representative must re-enter or otherwise manipulate the information before it can be processed downstream.

10. Manual access arrangements are simply not compatible with MCI's needs as a new entrant seeking to compete against an entrenched incumbent. Every manual intervention causes delay, sometimes substantial, and creates significant risk of error. By relying upon manual interventions, the ILEC can hold its competitors hostage to its own response time, hours of operation, and ability (or incentive) to provide accurate information. Also, manual arrangements increase CLECs' costs in two ways: CLECs must employ more people to handle the process and to audit the ILEC's performance; and the ILEC will try to pass its own inflated costs through to the CLECs. Accordingly, solutions that require manual intervention on the ILEC's side cannot be

acceptable in either the short or long term.

11. Automated access enables information to be exchanged between the CLEC and BOC computers without the need for human intervention by the BOC. The most sophisticated type of automated access is termed electronic bonding and is articulated by several different specific protocols, the most common of which is the Open Systems Interconnect (OSI) Common Management Information Services Element (CMISE) Common Management Information Protocol (CMIP) network management protocol. Electronic bonding enables CLECs to approach the real-time access to the BOC's functions enjoyed by the BOC itself. It also allows customer interactions with a CLEC to be indistinguishable from interactions with the ILEC. Furthermore, because electronic bonding links the CLEC's existing OSS system to that of the ILEC, the CLEC does not need to develop a new OSS to interface with the ILEC for each different function.

12. Less sophisticated automated access arrangements include dedicated access arrangements. In these arrangements, a CLEC has a computer terminal that gives it direct access to the ILEC's system. The ILEC's system is not connected to the CLEC's system, however. Thus, when the CLEC obtains information from the ILEC system, it must retype that information into its own system.

13. Another less sophisticated automated arrangement involves the transfer of data between computer systems in batches. These "batch transfer" solutions work much like electronic mail. File transfer protocol, perhaps the classic batch interface, transmits large amounts of data at scheduled, periodic intervals. A second common

batch transfer interface is Electronic Data Interface ("EDI").

14. The question remains which automated interfaces are acceptable. The short answer is that each ILEC should adopt those interfaces and data formats that have been approved by the relevant national standard-setting bodies or industry forums. The three principal groups are: the OBF of the Carrier Liaison Committee; the T1 Committee; and the Electronic Communications Implementation Committee ("ECIC"). All three are sponsored by the Alliance for Telecommunications Industry Solutions ("ATIS") and accredited by ANSI.

15. ILECs should adopt standardized systems for two reasons. First, for CLECs that hope to compete in markets presently controlled by different BOCs, it is critical that interfaces be uniform. The costs of developing systems and software to interface with a particular OSS interface and of training the employees to use that interface are substantial. Obviously, if interfaces vary from region to region, the costs are multiplied accordingly. This is why most BOCs try to unify their own systems. Bell Atlantic, for example, uses the same OSS interfaces and formats throughout its region. A nationwide CLEC like MCI must be able to realize similar economies. We can only do so, however, if the several large ILECs conform to nationally standardized interfaces and formats.

16. Second, the industry forums are well positioned to resolve which interfaces and formats are best suited for each particular OSS function. While electronic bonding solutions -- with their real-time accessibility -- are essential for any function that is

user (such as all pre-ordering functions), some sorts of batch transfer solutions might adequately serve competitive needs for other functions.

17. As a result, I agree with the FCC that "[i]deally, each incumbent LEC would provide access to support systems through a nationally standardized gateway." Local Competition Order ¶ 527. Consistent with this view, MCI is investing its development funds for OSS in the technical interface solutions developed through the industry forums. The FCC chose to rely on the carriers voluntarily to agree to nationally standardized interfaces. The likelihood that the large ILECs and CLECs will reach voluntary consensus on nationally uniform interfaces will be sorely tested, however, if the BOCs are allowed to offer in-region long distance services before such solutions are adopted. Because the time and additional capital investment required for CLECs to develop non-standard OSS interfaces represent a considerable barrier to entry, regulatory incentives toward standardization are critical.

18. While the industry forums have made substantial progress, they have not yet established standards for all OSS functions. In particular they have not finalized interfaces and standards for the information exchanges that typically occur before a CLEC actually places an order with an ILEC. Although this standard-setting process can and should be completed promptly, one still has to ask what a BOC should be expected to do in the interim in order to satisfy section 271. Part of the answer is that the BOC should not adopt a non-standard solution and refuse to conform to the standard when adopted. To the extent that standard-setting forums have not yet adopted standards for all functions, the BOC should be expected to adopt the least

costly interim solution that would give requesting carriers the same level of access to the BOC's OSS functions as the BOC itself enjoys. It is not reasonable for individual large ILECs to implement any interim solutions that would require CLECs to commit substantial resources of their own to access the ILEC's solution when equally adequate interim solutions can be devised that would prove less costly to the ILEC's would-be local competitors.

19. In short, a BOC's OSS interfaces should be deemed satisfactory only if these conditions are satisfied: (1) Wherever there exists an existing industry standard, the BOC must have adopted and implemented it; and (2) wherever an industry standard does not yet exist, the BOC must (a) enter into a binding contractual commitment (backed up by adequate contractual guarantees and regulatory penalties) to comply with industry standards as soon as possible (pursuant to a specified implementation schedule) and (b) offer and implement an interim solution that gives requesting carriers the same level of access that the BOC's operational groups have to its systems, and that is as consistent as possible with expected industry standards. Because OSS interfaces, like other software packages and operating protocols (such as WordPerfect and Microsoft Windows) are periodically updated and improved, conformance with industry standards requires adoption of the most advanced available specifications for a given standardized interface. For example, that would mean BOCs should presently be using the long-available EDI version 6.0 for ordering functions and should shortly transition to EDI version 7.0, recently approved by the Telecommunications Industry Forum and endorsed by the OBF.

20. The pro-competitive conditions I have set forth above are not unduly onerous to the BOCs. In fact, Bell Atlantic argued before the FCC last summer that ILECs could "achieve consensus on national standards such that within 12 months 95% of all inter-telecommunications company transactions may be processed via nationally standardized electronic gateways." See Local Competition Order ¶ 527. Unfortunately, as described in this Declaration, Bell Atlantic has thus far failed to formalize its commitment to many of these standards.

Operational Readiness

21. The adoption and implementation of an appropriate OSS interface, configured to appropriate specifications, are necessary conditions for the development of local competition, but they are far from sufficient. The interface merely governs the communication between the ILEC and CLECs. The theoretical capacity for rapid and efficient communication between the carriers is of minimal utility if either the ILEC lacks the internal systems necessary satisfactorily to effect the functions a particular interface is designed to support, or the CLECs lack the systems, software, and training needed to make efficient and effective use of the OSS access provided. Therefore, before a BOC can establish that it will be able to provide unbundled network elements or resale services in a competitively acceptable manner, it must demonstrate both (a) that its OSS interfaces are linked to downstream systems that enable it to make

appropriate use of the interfaces and (b) that it provides adequate training and support to competing local carriers to enable them to make appropriate use of the interfaces. I will discuss both of these two points.

22. Local exchange carriers must, and do, have advanced OSS capabilities simply to run their internal operations that have nothing do with the particular LEC's relationship to other carriers. Some of these processes will work essentially the same way whether the function at issue is performed for an end-user or a CLEC. For example, when a customer orders new service from a reseller that requires a line to be turned up, the reseller basically stands in the shoes of the BOC: if the interfaces between the two carriers work as they should, the fact that the pre-ordering and ordering processes are mediated through a new carrier (the CLEC) should not add additional complication to the BOC's existing provisioning systems. That is, the provisioning function itself should look much the same regardless whether the end-user takes that service directly from the BOC or from a reseller of the BOC's service.

23. But there are other ways in which the new CLEC-ILEC dynamic does impose new requirements on the ILEC's downstream systems. For example, before the 1996 Act, the ILECs did not have OSS systems in place to effectuate the unbundling of local switching. When a CLEC orders unbundled elements, the ILEC faces a new challenge not only in receiving and understanding that order (this is where the ordering interfaces come in), but also in carrying out that order. Thus, in addition to implementing an adequate interface, the ILEC must put in place business processes to use that interface as it is intended.

24. Assuming that an ILEC has deployed an appropriate interface and adopted the processes needed to ensure that it will use the interface effectively itself, it remains independently critical that the CLEC is able to use the ILEC's interfaces effectively. One may be tempted to assume that this is the CLEC's own problem, and that the ILEC has no responsibility to train or support the new entrants. From the perspective of system development, that is a mistaken view. The ILECs in general, and certainly the BOCs, drive the process. They select the interface, tailor its specifications and vocabulary, and control the timing of its implementation. Moreover, as the staff of the Wisconsin Public Service Commission has explained, because a CLEC will have to rewrite its own OSS interfaces whenever an ILEC modifies its interfaces, "a company with significant market share [like the BOCs] can extend that market share" simply by revising its OSS specifications.[3] This is true even where a BOC nominally adopts an interface approved by an industry forum, because most industry-standard interfaces are loosely defined to allow individual carriers flexibility in tailoring their own specifications.

25. Consequently, just as the market requires the manufacturer of a complicated software package to provide initial and ongoing customer support, regulators must ensure that the BOCs provide CLECs with adequate training and assistance -- including complete and intelligible manuals and pull-down on-screen menus where necessary. At the present time, however, Bell Atlantic has yet to indicate that it even

[3] Memorandum Re: Matters Relating to Satisfaction of Conditions for Offering InterLATA Service, Docket No. 6720-TI-120, at 11 (Wisc. PSC, Feb. 6, 1997).

has a standard process to notify the CLECs when it changes ordering forms, much less to train them on use of the new forms. Bell Atlantic's present affiant explained that:

> We're inventing all the operational process and procedures as we go, as we work on this stuff with you guys. . . . We're at the first point where something has changed, we're at the point how do we communicate that to everybody. I mean, we've had 12 years of experience on access, working back and forth and developing process and procedures with each other. You know, we're just at the point now in Pennsylvania where, beginning in October, we were installing the first unbundled loops . . . . But up to this point, there hadn't been anything that changed that we needed to develop a communication mechanism for.

Donald Albert, Application of MFS Intelenet of Pennsylvania, et. al.; Docket No. A-310203F0002, et. al , pp. 201-02 [MFS Phase III, Further Workshop, Dec. 4, 1996] (attached as Exhibit 1). This simply confirms that the transition to a workable system for OSS will take some time.

26. The process of ensuring that the business processes linked to a given OSS interface work as planned is itself lengthy and requires careful planning and testing. In addition, after each carrier's systems are developed and deployed, it is necessary to conduct "integration" testing -- full end-to-end trials designed to make sure that the systems can communicate properly with each other to accomplish the intended results in the designed manner. After integration testing has been successfully completed, it takes time to put the systems into actual competitive use, supporting "live" customer transactions. Even once this stage of actual implementation is reached, however, testing is not completed. To the contrary, it is almost inevitable that the early stages of actual competitive use will reveal design and operating flaws that had escaped detection up through integration testing, thus requiring further trouble-shooting and

system modification. These stages may also reveal where further training is needed.

27. Experience proves the critical point that a successfully tested OSS system is not the same thing as an operationally and commercially satisfactory system. The access arena shows why. For example, as Betty Tavidian explains in her accompanying affidavit, Bell Atlantic has been re-engineering many of its OSS systems since 1995 for use in the interexchange environment. In November 1996, it implemented the second phase of the new release of its Subscription System, which processes PIC changes, allowing customers to change carriers. Bell Atlantic assured MCI and other interexchange carriers (IXCs) that its new version had satisfied thorough internal testing before being introduced for commercial use. Nonetheless, the new system has been disastrous in actual operation. For example, it has failed to process numerous properly inputted PIC change orders, has delayed the processing of many others for a week or longer, and has returned incorrect responses to MCI orders that, among other things, incorrectly report existing subscriber accounts as nonexistent or closed. Furthermore, Bell Atlantic's OSS lacked controls to identify the processing problem quickly. As a result, weeks passed before MCI was even notified that Bell Atlantic was not properly effectuating customer PIC changes.

28. As the discussion above should make clear, from an OSS perspective, paper promises are not enough to ensure effective real-world application. Because deploying "operationally ready" OSS is a substantial and time-consuming undertaking, there is a real difference between saying a system is ready and actually using it to provide services in a commercially satisfactory way. In light of the potential glitches and

pitfalls that must be eliminated prior to commercial availability, one cannot know how well things can be provided until they are supported by a full and varied track record of having been provided.

29. In fact, Bell Atlantic's witness, Don Albert, admitted as much at the MFS III workshop on December 4, 1996:

> Because the very first time, you know, . . . there's going to be a higher probability for errors on both sides than the second time that they do it and the third time and the fourth time. So, I think we've had pretty good luck trying to do things in test order nature and trying to do things of official service. But trying to do some real work back and forth in the specific geography between the operational employees on both sides, try to get that done before we actually hit the real live customer mode. (Exh. 1, at 266)

In short, OSS must be in real competitive use (not just business trials), subject to auditing and monitoring of key performance indicators and/or operation performance indicators, before OSS can be deemed to be operationally and competitively satisfactory.

II. Flaws in Bell Atlantic's OSS Systems

Summary of Problems With Bell Atlantic

30. Given this background, Bell Atlantic's OSS is nowhere near sufficient to meet the requirements of the Telecommunications Act. First, Bell Atlantic does not even claim that it is currently able to meet those requirements. Of the five basic OSS functions, Bell asserts that it currently has an acceptable interface for use by CLECs with respect to only one of those functions (maintenance and repair). With respect to the others, Bell asserts that it "is currently conducting an end-to-end Operational Readiness Test of its OSS with a randomly selected reseller to validate the production capabilities of Bell Atlantic's OSS." (Albert Decl. ¶ 71). In other words, there is no indication that up until now Bell Atlantic has even successfully **tested** its OSS with a CLEC, much less employed its OSS successfully in a competitive environment. At present, the OSS offered by Bell Atlantic relies on faxes and other manual procedures -- which are wholly inadequate for all of the reasons I have pointed out previously.

31. Indeed, up until its filing in this case, Bell Atlantic gave no indication that it was even ready to proceed with testing of its automated interfaces with CLECs. Even since Bell's filing, when MCI requested to proceed with a test, Bell refused to agree to such a test with real customers. In fact, as recently as March 6, Bell's response to a specific MCI request was that Bell was **not** yet able to provide even a **demonstration**

of its pre-ordering interface. In addition, in its current filing, Bell Atlantic has only indicated an intent to proceed with a test for resale, not for unbundled elements. Thus, even if this test is successful, it would only show that Bell's OSS works in a test environment, for resale only, and with only one CLEC submitting orders. Moreover, there is reason to doubt that this test will succeed. Bell Atlantic has not presented any data that show even that successful internal tests have been conducted. And within the last week I learned that as Bell began its test with a chosen CLEC, and the CLEC began sending orders for resale service for new customers, flaws in Bell's ordering systems have caused **Bell Atlantic** calling cards to be sent to the customers of the new CLEC. Because Bell has yet to implement its OSS, there is also no way to know if Bell will provide adequate training to CLECs to enable them to use the system with minimal difficulties Bell Atlantic's OSS is therefore a long way from smooth operation in a competitive environment with many CLECs. Allowing Bell Atlantic to enter long distance now removes its incentive to bring such an OSS into being.

32. Second, in some cases, the interface to which Bell Atlantic is committed is inadequate on its face. For example, Bell's Electronic Communications Gateway ("ECG") is unacceptable even as an interim solution for several pre-order functions for the reasons described in this Declaration. Similarly, Bell's **manual** process of "jeopardy notification" is unacceptable as a long term solution; yet Bell appears to intend to use it for just such a purpose.

33. Third, in some cases, Bell Atlantic has not made a commitment to any

particular standard. For example, in the case of the codes used to order particular services (currently called USOC codes), Bell has not stated whether it will adopt the standard codes recently defined by the Telecommunications Industry Forum (TCIF) Electronic Data Interchange (EDI) Service Order Sub-Committee (SOSC) as Feature Codes. Likewise, in the case of Firm Order Confirmations, Bell has not stated that it will use the OBF endorsed EDI format. Because Bell has not stated what format it does intend to use, there is no way of determining that the format will be an acceptable one.

34. Fourth, in those areas where the OBF is currently in the process of finalizing standards, Bell Atlantic has not yet committed itself to accept the results of the OBF efforts. Where Bell has adopted a merely workable interim solution now, Bell should make a commitment that when OBF decides on a solution, Bell will adopt that solution. Bell Atlantic's failure to make such a commitment is particularly worrisome in the case of pre-ordering, where Bell seemingly touts the wonders of its ECG system for the long term. In reality, ECG is at best an acceptable interim solution for some pre-order functions.

35. Finally, Bell Atlantic has refused to agree to adequate performance standards and reporting requirements. These are critical in order for CLECs to be able to enforce Bell Atlantic's stated intention to provide reasonable service at parity with the service provided to Bell Atlantic's own customers. I will elaborate on these problems in the context of my discussion of the various OSS functions below.

Pre-Order

36. The pre-order function involves the exchange of information between carriers prior to, and in anticipation of, the placing of an actual order. Bell Atlantic lists seven key sub-functions that it will be able to provide through its Electronic Communications Gateway (ECG): (1) access to customer service records; (2) access to directory lists by NXX; (3) the ability to select and reserve telephone numbers while the end-user is on the line; (4) determination of features available to the end-user; (5) the ability to select an order due date and to schedule any necessary outside work while the end-user is on-line; (6) address validation; and (7) the ability to determine long distance carrier by NXX. (Albert Decl. ¶ 65). This list is incomplete. In order for local competition to be fully viable, eleven separate pre-order sub-functions must be electronically supported. The additional four are: (8) block of direct inward dial (DID) numbers inquiry; (9) telephone number's trouble history; (10) DID trunk inquiry; and (11) unbundled network element service provider inquiry.

37. These important missing functionalities are presently being addressed at the OBF. The unbundled network element service provider inquiry, for example, is essential in an environment in which multiple service providers might be providing different pieces of a single customer's service -- where, say, carrier A furnishes the loop, carrier B furnishes the switching capability, and carrier C furnishes directory

assistance services. By overlooking this functionality, Bell Atlantic's pre-order OSS fails to present all information that a CLEC requires at the pre-ordering stage in order to convert an existing customer services through an unbundling situation involving another CLEC. Thus, only Bell Atlantic has visibility into the existing unbundled network architecture for a customer that converts between CLECs. This is discriminatory.

38. More significantly, the ECG is inadequate as either a long term or an interim solution. The ECG provides dedicated access to Bell Atlantic's OSS system. It is essentially the provision of Bell Atlantic's own OSS terminals to MCI. The first problem is that in order to perform a pre-ordering function, an MCI representative must use the Bell Atlantic ECG and then must also use MCI's own internal system. In contrast, a Bell Atlantic representative has to use only Bell Atlantic's own internal system. For example, in taking a customer's order to add a feature, a service representative must enter a customer's address into the system. The address generally must exactly match the address already in the system in order to be processed correctly (e.g., it cannot say 19th St. instead of 19th Street). A Bell Atlantic service representative can simply enter the customer's name and automatically retrieve the proper address. An MCI representative using ECG can also retrieve the proper address, but then must manually retype the address into MCI's system. This is because the Bell Atlantic system is not electronically bonded to the MCI system. Such dual data entry not only creates delay while the customer waits on the line, it also inevitably results in order entry errors that impact customers' requested services.

39. In addition, as a proprietary Bell Atlantic system, ECG is likely to be difficult to integrate into CLEC applications. Proprietary systems create significant industry variations, creating challenges for training CLEC representatives to service customers across multiple service areas. MCI does not have a separate customer service center for each RBOC -- let alone each ILEC. Imagine training personnel on numerous different systems just to reserve a phone number for a new customer or to ascertain the next available date for customer service.

40. While ECG is an unsatisfactory solution, it is also true that national guidelines for pre-order are not yet completed. National pre-order standards are currently in the development stages in the Ordering & Provisioning Committee of the OBF. In addition, the Electronic Communications Implementation Committee ("ECIC") is working to develop real time OSS gateway alternatives. MCI fully supports the development of information exchange requirements, data stacks, and the resolution of this critical business process issue through an open industry forum process. MCI's position has been, and continues to be, that an Electronic Bonding solution based on the proven implementation of an Open System Interconnect (OSI) Common Management Information Services Element (CMISE) Common Management Information Protocol (CMIP) electronic communications protocol will best meet this business requirement. Assuming Bell Atlantic and other BOCs participate cooperatively, MCI expects pre-ordering standards to be finalized and available this year.

41. Until such time as this standard is adopted, ECG may be an acceptable interim

solution for some pre-order functions.[4] However, Bell Atlantic should commit itself to provide the industry accepted standard when it becomes available. This Bell Atlantic has refused to do. If Bell is permitted entry into the in-region long distance market prior to making a commitment to move to industry standards, it will have no incentive in the future to use industry standards as they are adopted, thus creating additional burdens and expense for CLECs.

42. In addition, there are several important pre-order functions for which Bell Atlantic could provide far superior interim solutions than ECG at little cost to itself. Information on customer street addresses, feature availability by switch, and PIC availability by switch is not particularly time sensitive. Bell Atlantic could provide this information on a regular basis (e.g., monthly) on magnetic tape or CD Rom or through an electronic download. This would allow MCI to electronically enter the information into its own system to be available to customer service representatives. MCI representatives would not have to use the Bell system and then re-enter the data manually into the MCI system. Several other BOCs have implemented such a system. Bell Atlantic has refused to offer such a system, however, putting MCI at a significant competitive disadvantage.

43. Finally, and most importantly, Bell Atlantic provides no basis on which to conclude that its pre-order interfaces (such as they are) are operationally ready. Mr. Albert avers that "BA-PA **will** provide[] access to its operational support systems

[4]To date, MCI has not seen any detailed description of ECG, so there is no way to be certain if this is correct.